

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARECLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE

2005 JUN -6 AM 10:39

JEROME K. HAMILTON, a.k.a.)	
CHEIKH AHMED ELOHIM,)	
PLAINTIFF.)	<u>Civil Action No. 04-1422-GMS*</u>
V.)	
CATHY L. GUESSFORD, et al.,)	<u>Motion For Reconsideration For Appointment</u>
)	<u>Of Trained Counsel.</u>
DEFENDANT'S.)	
)	

MOTION FOR RECONSIDERATION FOR APPOINTMENT
OF TRAINED COUNSEL.

Plaintiff Jerome K. Hamilton/Pro Se, being first duly sworn, hereby declares under penalty of perjury states the following: That Plaintiff, is disabled senior citizen who cant work a real job concerning health reason's, due to the nightmares and flashbacks cause by the defendant's illegally and unconstitutionally imprisoned for a period of four years and sixty-eight days. Plaintiff, is not able to afford private counsel to represent plaintiff in above-captioned case.

Comes Now, Plaintiff Jerome K. Hamilton/Pro Se, hereby respectfully request and move this Honorable Court in its discretion should grant plaintiff motion and appointment of trained counsel to represent plaintiff in above-captioned case who is an indigent civil litigant. See: 28 U.S.C.A. & 1915(e)(1)(West 1998). Also Plaintiff, circumstance's warrant a appointment of trained counsel, because plaintiff is having difficulty, concentrating, flashbacks and nightmares which are affecting plaintiff functioning. See: (ATTACHED EXHIBIT- A). That document is from plaintiff, Doctor/Psychiatrist/P.D. Lifrak, M.D.,

THE GROUNDS FOR THIS MOTION ARE:

1. Plaintiff Jerome K. Hamilton/Pro Se, want to raised for the record respectfully request that this Honorable Court to take judicial notice, that plaintiff is taking mental health medication's like Seroquel/25-MG, ETC. This medication's have cause plaintiff, not to adequately have the ability to pursue an written deposition; FED.R.CIV.P.33(interrogatories); and FED.R.CIV.P.34(document requests);FED.R.CIV.P.36(requests for admissions). The plaintiff, doctor name is or under their care are: Doctor/P.D. Lifrak, M.D. - Community Plaza-287 Christiana RD.-Suite 8- New Castle, Delaware.19720/and/ - address one of my doctor office are: Doctor/P.D. Lifrak,M.D.,-1701 Shallicross -Avenue,-Suite A -Wilmington,Delaware.19806. See:(Attached Exhibit-A).....

2. Plaintiff Jerome K. Hamilton/Pro Se, want to raised for this motion on record respectfully request that this Honorable Court to take judicial notice, that plaintiff case will need a factual investigation needed in this matter does appear so extensive at this stage to warrant the appointment of trained counsel. Finally Plaintiff, believe that Hamilton's case will turn on credibility determination which will require expert testimony. Plaintiff, feel that the time have arise, the court should entertain plaintiff reconsideration motion for appointment for trained counsel at this time. Because Doctor/P.D. Lifrak, M.D. on June 2,2005 stated plaintiff is having difficulty, concentrating, cause by flashbacks and nightmares which are affecting plaintiff thinking and functioning. See:(Attached Exhibit-A).

Wherefore, The Plaintiff Jerome K. Hamilton/Pro Se, is entitle for relief hereby respectfully requests this Honorable Court to enter - an order in its discretion by granting plaintiff motion for reconsideration - for appointment of trained counsel to represent plaintiff in above-captioned - case who is an indigent civil litigant. See: 28 U.S.C.A. & 1915(e)(1)(West 19-98). Another reason why plaintiff should received a trained counsel, because plaintiff is suffering difficulty, concentrating, from flashbacks and nightmares which are affecting his thinking functioning. See:(Attached Exhibit-A).. Plaintiff, seriously believe that his case do warrant appointment of counsel - because the defendant's take the plaintiff liberty illegally and unconstitutionally imprisonment for a period of four years and sixty-eight days.

Dated: June 3,2005.

Respectfully Submitted

Plaintiff/Jerome K. Hamilton
Pro Se, *Cheikh Ahmed Elohim*
a.k.a./Cheikh Ahmed Elohim
320 East Fifth Street/Apt.609
Wilmington, Delaware.19801

Sworn to and Subscribed before me, this 6 day

of June 2005.

Alice M. Slaughter

P. D. LIFRAK, M.D.
1701 SHALLCROSS AVENUE, SUITE A
WILMINGTON, DE 19806

TELEPHONE (302) 654-7317

DEA REG. NO. BL1793290

FOR

Charles Elshim

AGE

ADDRESS

DATE

6/2/05

PRESCRIPTION	MG/CC	QUAN.	REFILLS
1R To whom it may concern,			0 1
			2 3
			4 5
2R MR Elshim is under my care			0 1
He is difficultly concentrating, flosshing			2 3
3R + migranes afficing his functioning			4 5
			0 1
			2 3
			4 5

SUBSTITUTION PERMITTED

IN ORDER FOR A BRAND NAME PRODUCT TO BE DISPENSED, PRESCRIBER MUST HAND
WRITE 'BRAND NECESSARY' OR 'BRAND MEDICALLY NECESSARY' IN THE SPACE BELOW.

Exhibit- A

- Certificate Of Service -

State Of Delaware)
New Castle County) SS:
)
)

BE IT REMEMBER, that Plaintiff Jerome K. Hamilton/Pro Se being first duly sworn according to law and the penalty of perjury, on the - or this 3th, day of June 2005, placed in the U.S. mail . Two true and correct copies of the attached: Motion For Reconsideration For Appointment Of Trained Counsel. And this document will be sent to the below person's.

1. Peter T. Dalleo, Clerk
Clerk of the Court
United States District Court
844 King Street
J.Caleb Boggs Federal Building
Wilmington, Delaware.19801

2. Eileen Kelly,I.D.#2884
Deputy Attorney General
Carvel State Office Building
820 North French Street,6th Floor.
Wilmington, Delaware.19801

3. Plaintiff/Jerome K. Hamilton,Pro Se,
a.k.a., CHEIKH AHMED ELOHIM
320 East Fifth Street/Apt.#609
Wilmington, Delaware.19801

RESPECTFULLY SUBMITTED
Jerome K. Hamilton
PLAINTIFF/JEROME K. HAMILTON
Pro Se: